

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

Row Vaughn Wells,

Plaintiff,

v.

The City of Memphis *et al.*,

Defendants.

Case No. 2:23-CV-02224

JURY DEMAND

JOINT STATUS REPORT REGARDING MEDIATOR SELECTION

The Parties, by and through their undersigned counsel, jointly submit the following status report regarding their efforts to select a mediator for this case and requesting the Court's guidance because the Parties are at impasse.

1. At the January 3, 2025 status hearing, the Court ordered the Parties to confer and select a new mediator by February 18, 2025, with the Court making the selection if the Parties are unable to reach agreement. ECF 291 at 36-37; ECF 276 at 2.

2. On February 5, 2025, Plaintiff initiated discussions regarding potential mediators. Since then, counsel for the Parties have conferred over email and by phone on multiple occasions. Despite their efforts, the Parties have been unable to reach agreement on a mediator.

3. Given that the Parties are at impasse, the Plaintiff and the City of Memphis wish to submit respective lists of no more than three proposed mediators each for the Court to consider and make a selection. The Parties respectfully request that the Court advise the Parties of its preferences for the submission of proposed mediators, including whether the submissions should be made on the Court's public docket or via email to the Court.

Dated: February 18, 2025

Respectfully submitted,

s/ Bruce McMullen

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**
Bruce McMullen (#18126)
Jennie Vee Silk (#35319)
Freeman B. Foster (#23265)
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone: (901) 526-2000
bmcmullen@bakerdonelson.com
jsilk@bakerdonelson.com
ffoster@bakerdonelson.com

*Attorneys for Defendant City of Memphis,
Chief Cerelyn Davis, and
Dewayne Smith as Agent of the City of Memphis*

/s/ Antonio M. Romanucci

Antonio M. Romanucci (Ill. Bar No. 6190290)
Bhavani K. Raveendran (Ill. Bar No. 6309968)
Sarah Raisch (Ill. Bar No. 6305374)
Joshua M. Levin (Ill. Bar No. 6320993)
Stephen H. Weil (Ill. Bar No. 6291026)
Sam Harton (Ill. Bar No. 6342112)
ROMANUCCI & BLANDIN, LLC
321 N. Clark St., Ste. 900
Chicago, IL 60654
P: (312) 458-1000
aromanucci@rblaw.net
b.raveendran@rblaw.net
sraisch@rblaw.net
jlevin@rblaw.net
sweil@rblaw.net
sharton@rblaw.net

David L. Mendelson (Tenn. Bar No. 016812)
MENDELSON LAW FIRM
799 Estate Place
Memphis, TN 38187
+1 (901) 763-2500 (ext. 103), Telephone
+1 (901) 763-2525, Facsimile
dm@mendelsonfirm.com

Brooke Cluse (Tex. Bar No. 24123034) (*pro
hac vice pending*)
BEN CRUMP LAW, PLLC
717 D Street N.W., Suite 310
Washington, D.C. 20004
+1 (337) 501-8356 (Cluse), Telephone
brooke@bencrump.com

Attorneys for Plaintiff